

UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT

In re:

ROMAN CATHOLIC DIOCESE OF
BURLINGTON VERMONT,

Case No. 24-10205
Chapter 11

Debtor.

**DECLARATION OF GILLIAN N. BROWN CONCERNING PASS-THROUGH
EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP FOR EVERLAW**

I, Gillian N. Brown, declare under penalty of perjury as follows:

1. I am of counsel at Pachulski Stang Ziehl & Jones LLP ("PSZJ"), with an office address at 10100 Santa Monica Blvd. 13th Floor; Los Angeles, CA 90067-4003. I am duly admitted to practice law in the State of California; the State of New York, and the District of Columbia. As part of my litigation and bankruptcy litigation practice, I am part of the PSZJ internal e-discovery committee, which manages electronic discovery initiatives at PSZJ. In addition, I have worked on litigation in sexual abuse-related chapter 11 cases at PSZJ for more than 20 years.

2. In an order filed and entered on January 3, 2025, the Court approved PSZJ's employment as counsel to the Official Committee of Unsecured Creditors (the "Committee") Committee, effective as of November 11, 2024. *See* Docket No. 151.

3. As set forth more completely in PSZJ's employment application (Docket No. 110), it is PSZJ's policy to charge its clients in all areas of practice for expenses incurred in connection with the client's case. Among the necessary expenses in this case is the use of Everlaw, an electronic discovery platform that permits PSZJ and the Committee to process and store discovery for searching, analyzing, organizing, storing, and sharing documents,

electronically stored information, and associated metadata. Everlaw's website is www.everlaw.com.

4. In this case, as is PSZJ's customary practice in other cases involving documentary and/or electronically stored evidence, PSZJ established a database on the Everlaw ediscovery platform. That database is used solely for this case. On a monthly basis, Everlaw sends PSZJ an invoice for the monthly charges associated with the Everlaw platform in this case. Attached as **Composite Exhibit 1** to this declaration are true and correct copies of Everlaw invoices that PSZJ has received from Everlaw relating to the platform in this case. Each invoice indicates "Diocese of Vermont, Burlington" as an identifier that the invoice and the charges in the invoice is connected to this case only.

5. Upon receipt of an invoice in this case, PSZJ attorneys or paralegals review the invoice to ensure proper billing amounts and then forward the invoice to PSZJ's accounting department for payment. Once PSZJ pays the Everlaw invoice, the amount PSZJ pays to Everlaw is listed as an expense on PSZJ's bill in this case. That PSZJ bill is then provided to the Committee for approval after which it is then filed with the Court as an exhibit to a monthly fee statement and/or an interim fee application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: Ventura, California
June 24, 2025

/s/ Gillian N. Brown
Gillian N. Brown

Exhibit 1

Invoice number 137034
Invoice date Dec 31, 2024
Payment terms Net 30
Currency US Dollar

**Bill To**

Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd FI 13
Los Angeles CA 90067-4003
United States

Billing Reference

AMOUNT DUE

\$241.94

Due on Jan 30, 2025

PERIOD: Dec 2024

ITEM	QUANTITY	RATE	AMOUNT
Subscription Diocese of Burlington, Vermont	1	\$22.00	\$22.00
Subscription Diocese of Burlington, Vermont (1 GB) (\$250.0))	1	\$228.00	\$228.00
Subscription Diocese of Burlington, Vermont (prorate 30/31))	1	(\$8.06)	(\$8.06)
Subtotal			\$241.94
Sales tax			\$0.00
Total			\$241.94
Paid/Credit			-\$0.00
Amount due			\$241.94

For detailed information regarding usage across your account, please reference the platform.

Payment instructions

Please include invoice number(s)
and invoice amount(s) with your
payment.

Send remittance email to
ar@everlaw.com.

For billing issues please contact
billing@everlaw.com.

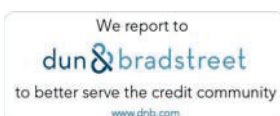
US Tax ID: 27-4422378

Pay by check

Everlaw, Inc.
PO Box 786166
Philadelphia, PA 19178-6166

Pay by ACH / Wire Transfer

Wells Fargo
525 Market St, 5th Floor
San Francisco, CA 94105
Account #: 3445808581
Account name: Everlaw, Inc.
ABA/Routing: 121042882
Domestic Wire Transfer: 121000248
SWIFT code: WFBIUS6S (international)



Invoice number 140609
Invoice date Jan 31, 2025
Payment terms Net 30
Currency US Dollar

**Bill To**

Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd FI 13
Los Angeles CA 90067-4003
United States

Billing Reference

AMOUNT DUE

\$250.00**Due on Mar 02, 2025****PERIOD: Jan 2025**

ITEM	QUANTITY	RATE	AMOUNT
Subscription Diocese of Burlington, Vermont	4	\$22.00	\$88.00
Subscription Diocese of Burlington, Vermont (4 GB) (\$250.0))	1	\$162.00	\$162.00
Subtotal			\$250.00
Sales tax			\$0.00
Total			\$250.00
Paid/Credit			-\$0.00
Amount due			\$250.00

For detailed information regarding usage across your account, please reference the platform.

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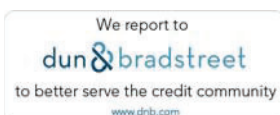
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Domestic Wire Transfer: 121000248
SWIFT code: WFBUS6S (international)



Invoice number 144213
Invoice date Feb 28, 2025
Payment terms Net 30
Currency US Dollar

**Bill To**

Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd FI 13
Los Angeles CA 90067-4003
United States

Billing Reference

AMOUNT DUE

\$250.00**Due on Mar 30, 2025****PERIOD: Feb 2025**

ITEM	QUANTITY	RATE	AMOUNT
Subscription Diocese of Burlington, Vermont	4	\$22.00	\$88.00
Subscription Diocese of Burlington, Vermont (4 GB) (\$250.00))	1	\$162.00	\$162.00
Subtotal			\$250.00
Sales tax			\$0.00
Total			\$250.00
Paid/Credit			-\$0.00
Amount due			\$250.00

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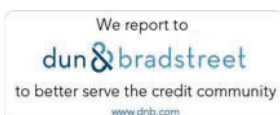
US Tax ID: 27-4422378

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Philadelphia, PA 19178-6166

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Wells Fargo
525 Market St, 5th Floor
San Francisco, CA 94105
Account #: 3445808581
Account name: Everlaw, Inc.
ABA/Routing: 121042882
Domestic Wire Transfer: 121000248
SWIFT code: WFBUS6S (international)



Invoice number 147507
Invoice date Mar 31, 2025
Payment terms Net 30
Currency US Dollar

**Bill To**

Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd FI 13
Los Angeles CA 90067-4003
United States

Billing Reference

AMOUNT DUE

\$250.00**Due on Apr 30, 2025****PERIOD: Mar 2025**

ITEM	QUANTITY	RATE	AMOUNT
Subscription Diocese of Burlington, Vermont	4	\$22.00	\$88.00
Subscription Diocese of Burlington, Vermont (4 GB) (\$250.00))	1	\$162.00	\$162.00
Subtotal			\$250.00
Sales tax			\$0.00
Total			\$250.00
Paid/Credit			-\$0.00
Amount due			\$250.00

For detailed information regarding usage across your account, please reference the platform.

Payment instructions

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For billing issues please contact
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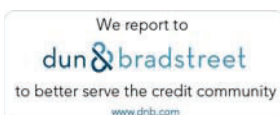
US Tax ID: 27-4422378

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Philadelphia, PA 19178-6166

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Wells Fargo
525 Market St, 5th Floor
San Francisco, CA 94105
Account #: 3445808581
Account name: Everlaw, Inc.
ABA/Routing: 121042882
Domestic Wire Transfer: 121000248
SWIFT code: WFBUS6S (international)



Invoice number 150831
Invoice date Apr 30, 2025
Payment terms Net 30
Currency US Dollar

**Bill To**

Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd FI 13
Los Angeles CA 90067-4003
United States

Billing Reference

AMOUNT DUE

\$250.00

Due on May 30, 2025

PERIOD: April'25 Usage

ITEM	QUANTITY	RATE	AMOUNT
Subscription Diocese of Burlington, Vermont	7	\$22.00	\$154.00
Subscription Diocese of Burlington, Vermont (7 GB) (\$250.00))	1	\$96.00	\$96.00
Subtotal			\$250.00
Sales tax			\$0.00
Total			\$250.00
Paid/Credit			-\$0.00
Amount due			\$250.00

For detailed information regarding usage across your account, please reference the platform.

Payment instructions

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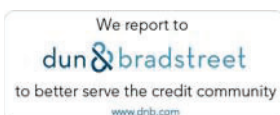
US Tax ID: 27-4422378

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Wells Fargo
525 Market St, 5th Floor
San Francisco, CA 94105
Account #: 3445808581
Account name: Everlaw, Inc.
ABA/Routing: 121042882
Domestic Wire Transfer: 121000248
SWIFT code: WFBUS6S (international)



Invoice number 154121
Invoice date May 31, 2025
Payment terms Net 30
Currency US Dollar

**Bill To**

Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd FI 13
Los Angeles CA 90067-4003
United States

Billing Reference

AMOUNT DUE

\$440.00**Due on Jun 30, 2025****PERIOD: May'25 Usage**

ITEM	QUANTITY	RATE	AMOUNT
Subscription Diocese of Burlington, Vermont	20	\$22.00	\$440.00

Subtotal	\$440.00
Sales tax	\$0.00
Total	\$440.00
Paid/Credit	-\$0.00
Amount due	\$440.00

For detailed information regarding usage across your account, please reference the platform.

Payment instructions

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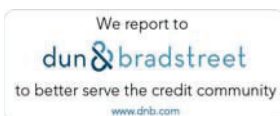
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In re:

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Case No. 24-10205
Chapter 11

Debtor.

CERTIFICATE OF SERVICE

I hereby certify that on **June 25, 2025**, I electronically filed the **Declaration of Gillian N. Brown Concerning Pass-Through Expenses of Pachulski Stang Ziehl & Jones LLP for Everlaw** with the Clerk of the Bankruptcy Court using CM/ECF system which sent notification of such filings to all ECF participants.

Additionally, I served the same on **June 25, 2025**, on the following notice parties via email:

Lorei Dawson
ldawson@vermontcatholic.org

Counsel for the Diocese, Fredrikson & Byron, P.A., Attn: Steven R. Kinsella, Esq.
skinsella@fredlaw.com

Local Counsel for the Diocese, Obuchowski Law Office
ray@oeblaw.com

Local Counsel for the Committee, Lemery Greisler LLC, Attn: Paul A. Levine, Esq.
plevine@lemerygreisler.com

Office of the U.S. Trustee, Attn: Lisa Penpraze
Lisa.Penpraze@usdoj.gov

Dated: June 25, 2025

/s/ Janice Washington
Janice Washington